



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

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MAR 05 2010

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VIA FED EX  
3/22/2010

Eric F. Pastor  
Pastor, Behling & Wheeler, LLC  
2201 Double Creek Drive, Suite 4004  
Round Rock, TX 78664

Re: Gulfco Marine Maintenance Superfund Site, Freeport, Texas  
Unilateral Administrative Order, CERCLA Docket No. 06-05-05A  
Final Baseline Human Health Risk Assessment (HHRA)



884505

Dear Mr. Pastor:

The Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) have performed a review of the above referenced document dated February 8, 2010. With this letter, the EPA approves the HHRA with the following modifications:

1. The Uncertainties Section of the Final HHRA includes the discussion of bioaccumulation in fish and shellfish. The text in Section 3.1.4 shall also reference the fact that bioaccumulation of fish and shellfish are not the same and that additional text is in the uncertainties section.
2. The Final HHRA includes an evaluation of both fugitive dust and volatile emissions, which is presented in Tables 16 and 17 and discussed in Section 2.2.1. The Final HHRA shall also include in Section 3.2 (Potentially Exposed Populations) a reference to these tables and discussion.
3. The Final HHRA includes the <sup>Air</sup>Soil<sub>inh-VP</sub> Protective Concentration Levels (PCLs) to evaluate the inhalation pathway in Tables 16 and 17 and as discussed in Section 2.2.1. The Final HHRA shall also include in Section 3.4.3 (Exposure Assumptions and Intake Calculations) a reference to these tables and discussion.
4. Section 4.4, page 31, of the Final HHRA characterizes the sources of toxicity data used in the risk assessment. This section shall also include a statement to the effect

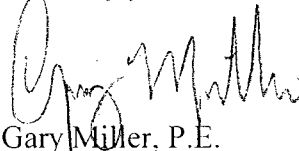
that when the project began, the Regional Screening Levels (RSLs) were not available and, therefore, were not used in the screening process or as a resource for toxicity information.

5. The list of acronyms shall be revised to include quality control (QC).
6. Section 2.2.2, page 14, paragraph 1: The last paragraph shall be edited to state: "COIs were retained...if they were measured in Site media at a concentrations that ~~was~~ were statistically different (higher) than background soils."
7. Section 2.2.3, page 15, Bullet 1: This sentence should read: "Measured in more than five percent of the samples for a given medium."

These modifications shall be incorporated in the referenced document and copies provided to the notification list within 30 days of receipt of this letter.

If you have any questions, please contact me at (214) 665-8318, or send an e-mail message to [miller.garyg@epa.gov](mailto:miller.garyg@epa.gov).

Sincerely yours,



Gary Miller, P.E.  
Remediation Project Manager

cc: Luda Voskov (TCEQ)  
Barbara Nann (6RC-S)  
Dipanjana Bhattacharya

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March 24, 2010

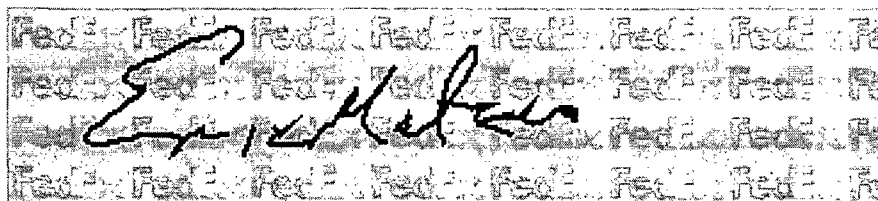
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